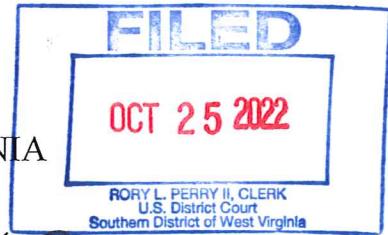


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA



LaCosta Steele

68341509

(Enter above the full name of the plaintiff or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 5:22-cv-00445

(Number to be assigned by Court)

Warden of Southern Regional
Jail & officers: Sgt Minor,
C/o Kittle

(Enter above the full name of the defendant or defendants in this action)

COMPLAINT

I. Previous Lawsuits

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____ No X

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county);

3. Docket Number: _____

4. Name of judge to whom case was assigned:

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: Secure Female Facility - Hazelton

A. Is there a prisoner grievance procedure in this institution?

Yes X No _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes _____ No X

C. If your answer is YES:

1. What steps did you take? _____

2. What was the result? _____

D. If your answer is NO, explain why not: This issue was at

Southern Regional Jail NOT SFF-Hazelton
Scared of Repressions

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: LaCosta Steele

Address: Sff-Hazelton Po Box 3000 Bruceton Mills WV, 26525

B. Additional Plaintiff(s) and Address(es): _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: Warden, Sgt Minor, Clo Kittle

is employed as: Staff

at Southern Regional Jail

D. Additional defendants: _____

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Medical Neglect, Raw Sewage, Physical Assulted

IV. Statement of Claim (continued):

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

Time off current Federal Sentence
Lawsuit
let noone else go through what i
Went through
Be Placed on Class Action Lawsuit
through Zachary Whitten, Pineville / charleston WV

V. Relief (continued):

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:
-

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes _____ No

If so, state the name(s) and address(es) of each lawyer contacted:

If not, state your reasons:

There is a class

Action lawsuit Zachary Whitten i
reached out to him by letter

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes _____ No

If so, state the lawyer's name and address:

Signed this 30 day of October, 2022.

LaConte Steele

Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/20/22.
(Date)

LaConte Steele

Signature of Movant/Plaintiff

Signature of Attorney
(if any)

VS
Warden At Southern Regional Jail
Officer: Sgt Minor, C/o Kittle

I was housed at Southern Regional Jail From 10/6/21 to 6/11/22

The Following occurred:

- 1.) MY Diabetes was neglected NO FS or Hbgac
- 2.) Im Type 2 Diabetic, NO Fasting sugars were taken NOR ANY HBGA1C
- 3.) Medical issues Never Addressed
- 4.) 10/6/21 to 10/16/21 I was in quarantine Pod A6 cell 7 no showers, NO Toilets, NO phone X 10 DAYS
- 5.) Sink worked but filled Sink And toilet
- 6.) NO clean clothes Never Sent Laundry out.
- 7.) Roommate: Margaret Shumate
- 8.) Raw Sewage in toilets
- 9.) Toilets Didn't Flush
- 10.) meals brought to us even while raw sewage in toilet
- 11.) Raw Sewage = Odor, sight = decrease food intake
- 12.) 11/3/22 to 3/17/22 Cell 2 Pod A5 leaked water from shower
- 13.) Water from People showering entered my cell through seems at bottom where cell 2 and shower meets DAILY.
- 14.) Three people in A one man cell
- 15.) Roommates: Michele Dalton and Rasnick
- 16.) 3/17/22 to 4/14/22 No water in cell 5 pod A5 X 1 Month
- 17.) Washed Hands and dishes in other cells
- 18.) I was physically assaulted on 4/3/22
- 19.) Preditors that threatened me, Bass, Fobert, Cline
- 20.) I was gone to school when Christy Fobert went through my legal mail under my bed. And Told everyone my charge.
- 21.) When i came back in pod A5 Preditors threatened to beat me.
- 22.) I hit the emergency button at the main door in A5
- 23.) C/o Kittle responded so i asked for a pod Change.
- 24.) Do to the situation in A5
- 25.) C/o Kittle asked me to pack my stuff so i did and waited at the main door for C/o Kittle to come back

9.) Clo Kittle came back to assist me in moving pods once in hall way i asked Clo Kittle were i was going she said Pod 6 which was right next door to A5

10.) Clo Kittle knew A5 and A6 talks through the blue door but i had told her they are going to talk through door she said no your going to have to go in there.

11.) I went in Pod A6 to cell 14 where Runyon was my roommate i heard the knock on the door for both pods A5 and A6 to speak to one another.

12.) Next thing i know i was attacked:

13.) Physically assaulted me! Jumped me

14.) Brittany Lester, Jane doe "shortie"

15.) I hit the emergency button Sgt Minor responded

16.) Sgt Minor refused to move me pods or have medical see me or let me shower to wash the blood ("my blood")

17.) instead Sgt Minor placed me in "PC" Protective Custody for 5 days ONLY

18.) When Medical came and saw i was badly bruised during medical fill pass line but Clo Kittle refused to let me and them do any assessment of my medical proceedings.

19.) I had black eyes, broken nose, busted lip; bruised inner upper lip

20.) Witness Roommate; Runyon.

Pg 3 Cont'd

- 1.) CLASS ACTION LAW SUIT, ATTORNEY ZACHARY WHITTEN
- 2.) SOUTHERN REGIONAL JAIL ON NEWS "WVVA NEWS" CHANNEL 6 NEWS

Deliberate Intentional indifference

emotional Abuse

mental Abuse

Physical Abuse is Healed but the trauma from being physically Attacked by 2 sets of Females on two sets of Blocks

I have nightmares I wake up shaking Sweaty I am currently taking Anxiety But Due to the trauma I suffed At the Hands of Inmates. STAFF AT SFF-Mazetton Had to Change my medications hoping to Alleviate some of my Anxiety/ Depression So I may sleep easier At Night

- 1.) Amendment 8 "Cruel and unusual punishment"
- 2.) Fourteenth Amendment "guarantees inc Arcerated persons humane conditions of confinement, adequate food, clothing, shelter And medical CARE. SAFETY of Inmates.

Relief! have time off my Sentence, current Sentence in federal Court, Make sure no one elses goes through what i went through!, Lawsuit!

Lakecia Steele 68341509
Secure Female Facility - Hazelton
Po Box 3000
Bruceton Mills WV 26325

Clerk, US District Court
Robert C. Byrd U.S. Courthouse
110 North Heber Street, RM 119
Beckley, WV 25801

